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PECEVED

MAR 3 5 2005

PUBLIC SERVICE COMMISSION

VIA OVERNIGHT MAIL

March 24, 2005

Beth A. O'Donnell, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: Administrative Case No. 2005-00090

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies of the Petition to Intervene of the Kentucky Industrial Utility Customers, Inc., filed in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place these documents of file.

Very Truly Yours,

Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

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MLKkew Attachment

ce: Certificate of Service A. W. Turner, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 24th day of March, 2005.

Allen Anderson South Kentucky R.E.C.C. P. O. Box 910 925-929 N. Main Street Somerset, KY 42502-0910

Mark A. Bailey Kenergy Corp. 3111 Fairview Drive P. O. Box 1389 Owensboro, KY 42302

Michael S. Beer VP - Rates & Regulatory Kentucky Utilities Company c/o Louisville Gas & Electric Co. P. O. Box 32010 Louisville, KY 40232-2010

Kent Blake
Director- State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

Sarah Botkin Business Service Manager Berea College Electric Utility Department CPO 2207 Berea, KY 40404

Dudley Bottom, Jr. Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, KY 40065

Daniel W. Brewer Blue Grass Energy Cooperative Corp. P. O. Box 990 1201 Lexington Road Nicholasville, KY 40340-0990 Jackie B. Browning Farmers R.E.C.C. 504 South Broadway P. O. Box 1298 Glasgow, KY 42141-1298

Overt L. Carroll Clark Energy Cooperative, Inc. P. O. Box 748 2640 Ironworks Road Winchester, KY 40392-0748

Sharon K. Carson Finance & Accounting Manager Jackson Energy Cooperative P. O. Box 307 U. S. Highway 421S McKee, KY 40447

Michael H. Core Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420

Bill Duncan Licking Valley R.E.C.C. P. O. Box 605 271 Main Street West Liberty, KY 41472

Carol H. Fraley President and CEO Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143

James B. Gainer Legal Division The Union Light Heat & Power Co 139 E. Fourth Street Cincinnati, OH 45202

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Salt River Electric Cooperative
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111 West Brashear Avenue
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Bardstown, KY 40004

James L. Jacobus Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087

Robert M. Marshall Owen Electric Cooperative, Inc. 8205 Highway 127 North P. O. Box 400 Owenton, KY 40359

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Anthony P. Overbey Fleming-Mason Energy Cooperative P. O. Box 328 Flemingsburg, KY 41041

Roy M. Palk East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707

Bobby D. Sexton President/General Manager Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240-1422

Honorable David Edward Spenard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204 david.spenard@ag.ky.gov

Michael L. Kurtz, Esq.

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Matter	of.
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AN ASSESSMENT OF KENTUCKY'S ELECTRIC GENERATION. : ADMINISTRATIVE CASE NO. 2005-00090 TRANSMISSION AND DISTRIBUTION NEEDS :

PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), the Kentucky Industrial Utility Customers ("KIUC") request that it be granted full intervenor status in the above-captioned proceeding and state in support thereof as follows:

- 1. KIUC is a non-profit corporation comprised of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies.
- 2. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

David F. Boehm, Esq. Michael L. Kurtz, Esq. BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Ph: (513) 421-2255 Fax: 513-421-2764

E-mail: KIUC@BKLlawfirm.com

3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision-making process herein and KIUC's participation will not unduly prejudice any party.

WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202

COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

March 24, 2005